

Form G-3 (20230922)

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: Sabrina Shafer ) Chapter 13  
 )  
 ) No. 24-07714  
 )  
 Debtor(s) ) Judge Deborah L. Thorne

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on September 11, 2024, at 9:15 a.m., I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, either in courtroom 682 of the Dirksen Federal Building, 219 S. Dearborn Chicago, Illinois or electronically as described below, and present the motion of Skyline Advanced Technology Services [to/for] Second Motion for Extension of Time to Object, a copy of which is attached. to Confirmation

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.


**Meeting ID and passcode.** The meeting ID for this hearing is 160 9362 1728, and the passcode is not required. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By:   
David A. Newby  
Attorney for Skyline Advanced Technology Services

**CERTIFICATE OF SERVICE**

I, Cynthia Bednarski, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on September 3, 2024, at 5:00 pm.

  
[Signature]

**United States Bankruptcy Court  
Northern District of Illinois  
Eastern Division**

**In Re**

Sabrina Shafer,	)	Chapter 13
	)	
Debtor,	)	Case No.: 24-07714
	)	
	)	Honorable Deborah L. Thorne
	)	Hearing Date: September 11, 2024
	)	Hearing time: 9:15 a.m.

**SERVICE LIST**

Patrick S Layng  
Office of the U.S. Trustee - Region 11  
USTPRegion11.ES.ECF@usdoj.gov  
(U.S. Trustee)  
(via CM/ECF system)

Marilyn O Marshall  
courtdocs@chi13.com  
(Trustee)  
(via CM/ECF system)

**Counsel for Sabrina Shafer:**

Justin R. Storer  
Law Office of William J. Factor  
105 W. Madison, Ste. 2300  
Chicago, IL 60602  
jstorer@wfactorlaw.com  
(via CM/ECF system)

Sabrina Shafer  
545 W. Belden Avenue #1F  
Chicago, IL 60614  
**Via regular mail**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re	)	Chapter 13
Sabrina Shafer,	)	
	)	
Debtor.	)	Case No.: 24-07714
	)	Honorable Deborah L. Thorne
	)	Hearing date: September 11, 2024
	)	Hearing time: 9:15 am
	)	

**SECOND MOTION OF SKYLINE ADVANCED TECHNOLOGY  
SERVICES TO EXTEND TIME TO OBJECT TO CONFIRMATION**

Skyline Advanced Technology Services (“Skyline”) moves this Court, under Fed. R. Bankr. P. 3015(f) and 9006(b) to further extend the time within which it must object to the confirmation of the Debtor’s Chapter 13 plan. In support of its motion, Skyline states as follows:

1. On February 6, 2024, Skyline was awarded a judgment in the United States District Court for the Northern District of California against the Debtor for \$745,061.53 based on, among other things, the Debtor’s breaches of duties owed to Skyline. A copy of the judgment order is attached hereto as Exhibit A. The Debtor is pursuing an appeal of that judgment order.<sup>1</sup>

2. On May 23, 2024, the Debtor filed her Chapter 13 petition in this Court commencing the above-captioned bankruptcy case. On that date the Debtor also filed her Chapter 13 plan.

3. Originally, the hearing on confirmation of the plan was set for July 10, 2024. Accordingly, pursuant to Fed. R. Bankr. P. 3015(f), Skyline’s objection to the plan would have

---

<sup>1</sup> The Debtor obtained an order of this Court on June 5, 2024, modifying the stay as to her appeal to the U.S. Court of Appeals for the Ninth Circuit. Additionally, that order provided stay relief to Skyline with respect to its own appeal from a separate order in the underlying litigation.

been due on July 3, 2024. Skyline moved the Court for an extension of time to object to the plan, which was granted by the Court on July 10, 2024, and which extended the time to object to September 3, 2024.

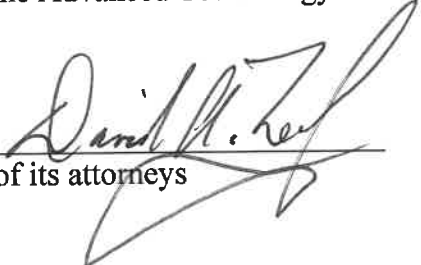
4. Since then, Skyline has obtained from this Court an order authorizing it to seek discovery from the Debtor and affiliated entities under Fed. R. Bankr. P. 2004. In accordance with that order, Skyline issued subpoenas to the Debtor and those affiliates. The production of documents pursuant to those subpoenas is due (per agreement of the parties) on September 6, 2024. Skyline will also seek to take the Debtor's deposition once it has reviewed the documents. This discovery is critical to Skyline's decision on objecting to the Debtor's plan.

5. On August 14, 2024, on motion of the Chapter 13 Trustee, the confirmation hearing on the Debtor's plan was rescheduled to September 25, 2024, making Skyline's objection due on September 18, 2024, under Bankruptcy Rule 3015(f). However, the Court's order establishing September 3, 2024, as the deadline for any objection by Skyline stands and has not been vacated. Therefore, in an abundance of caution, Skyline requests that the date by which it must object to the Debtor's plan be extended to September 18, 2024, without prejudice to a further extension if requested and allowed by the Court.

6. Counsel for the Debtor has been consulted and has no objection to Skyline's requested extension.

WHEREFORE, Skyline Advanced Technology Services prays this Court extend the time within which it must file an objection to the Debtor's Chapter 13 plan to September 18, 2024, and grant such other and further relief as may be appropriate in the circumstances.

Respectfully submitted,  
Skyline Advanced Technology Services

  
One of its attorneys

David A. Newby  
Momkus LLP  
1001 Warrenville Rd., Suite 500  
Lisle, IL 60532 / 630-434-0400  
ARDC No.: 6191580  
[dnewby@momkus.com](mailto:dnewby@momkus.com)

United States District Court  
Northern District of California

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SKYLINE ADVANCED  
TECHNOLOGY SERVICES,

Plaintiff,

v.

SABRINA SHAFER,

Defendant.

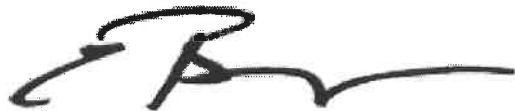
Case No. 18-cv-06641-CRB

**JUDGMENT**

The Court, having granted in part the motion for summary judgment filed by Plaintiff Skyline Advanced Technology Services, see Order on MSJ (dkt. 98), held a bench trial, see Bench Trial (dkt. 143), and ordered the disgorgement of \$745,061.53 in income as indicated in its Findings of Fact and Conclusion of Law, hereby ENTERS JUDGMENT for Plaintiff against Defendant.

**IT IS SO ORDERED.**

Dated: February 6, 2024



CHARLES R. BREYER  
United States District Judge

EXHIBIT

tabbles

A